

ROB BONTA  
Attorney General of California  
ANYA M. BINSACCA  
Supervising Deputy Attorney General  
KRISTIN A. LISKA  
KRISTEN C.A. KIDO  
Deputy Attorney General  
State Bar No. 315994  
455 Golden Gate Avenue, Suite 11000  
San Francisco, CA 94102-7004  
Telephone: (415) 510-3916  
Fax: (415) 703-5480  
E-mail: Kristin.Liska@doj.ca.gov  
*Attorneys for Defendants*

IN THE UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA  
WESTERN DIVISION

# UNITED STATES OF AMERICA.

Plaintiff.

1

**THE STATE OF CALIFORNIA; GAVIN C. NEWSOM, in his Official Capacity as Governor of California; KAREN ROSS, in her Official Capacity as Secretary of the California Department of Food & Agriculture; ERICA PAN, in her Official Capacity as Director of the California Department of Public Health; and ROB BONTA, in his Official Capacity as Attorney General of California.**

## Defendants.

Case No. 2:25-cv-06230-MCS-AGR

## **JOINT STIPULATION SETTING [PROPOSED] BRIEFING SCHEDULE**

Judge: The Honorable Mark C.  
Scarsi  
Trial Date: Not scheduled  
Action Filed: 7/09/2025

1 Plaintiff United States of America; Defendants the State of California,  
2 Governor Gavin Newsom, Secretary Karen Ross, Director Erica Pan, and Attorney  
3 General Rob Bonta; Proposed Defendant-Intervenors Humane World for Animals,  
4 Animal Legal Defense Fund, Animal Equality, The Humane League, Farm  
5 Sanctuary, Compassion in World, Farming, Inc., and Animal Outlook (“Proposed  
6 Animal Welfare Defendant-Intervenors”); and Proposed Defendant-Intervenor  
7 Association of California Egg Farmers, by and through their respective counsel,  
8 hereby agree and stipulate as follows:

9 1. On July 9, 2025, Plaintiff United States of America filed this suit against  
10 Defendants challenging several California laws and regulations as preempted by  
11 federal law.

12 2. On July 28, 2025, Proposed Animal Welfare Defendant-Intervenors filed  
13 an unopposed motion to intervene in this matter. Their motion remains currently  
14 pending before the Court, with a hearing date of September 22, 2025.

15 3. On August 1, 2025, Proposed Defendant-Intervenor Association of  
16 California Egg Farmers filed an unopposed motion to intervene in this matter.  
17 Their motion remains currently pending before the Court, with a hearing date of  
18 September 22, 2025.

19 4. On August 7, 2025, this Court granted the motion to extend the time for  
20 Defendants to respond to the complaint until September 10, 2025.

21 5. On August 27, 2025, the parties and all Proposed Intervenor-Defendants  
22 conducted a meet and confer call as required by Local Rule 7-3. On the call,  
23 Defendants stated that they intended to file a motion to dismiss. Plaintiff  
24 represented it intended to cross-move for summary judgment in response to that  
25 motion. All Proposed Intervenor-Defendants also indicated they intend to file  
26 proposed dispositive motions at the same time that Defendants file their motion to  
27 dismiss.

28

6. On September 2, 2025, Plaintiff filed a First Amended Complaint. Under Federal Rule of Civil Procedure 15(a)(3), Defendants' response to the First Amendment Complaint is now due September 16, 2025.

7. In order to facilitate the resolution of the forthcoming motions, the parties and all Proposed Intervenor-Defendants have discussed a proposed schedule for briefing and arguing the motions. Specifically, the parties propose the Court adopt the following schedule for briefing and argument:

- Defendants' Motion to Dismiss and Proposed Intervenor-Defendants' proposed Motions for Judgment on the Pleadings or Motions for Summary Judgment due Tuesday, September 16, 2025
- Plaintiff's single Consolidated Opposition and Cross-Motion for Summary Judgement due Thursday, October 16, 2025
- Defendants' and Proposed Defendant-Intervenors' individual Combined Reply and Oppositions due Monday, November 17, 2025.
- Plaintiff's single Consolidated Reply due Monday, December 8, 2025
- Hearing set for Monday, January 5, 12, or 26, 2026

8. This proposed schedule follows the briefing schedule set forth for a motion set for hearing more than 70 days after filing with a few short extensions of time to account for the parties' intention to file consolidated briefing on cross-motions that would provide a final resolution for this matter.

9. In addition, the parties propose the following word limits for the briefs:
  - Defendants' and Proposed Intervenors' Motions: 7,000 words each
  - Plaintiff's single Consolidated Opposition and Cross-Motion: 10,500 words
  - Defendants' and Proposed Intervenors' individual Combined Reply and Oppositions: 7,000 words each
  - Plaintiff's single Consolidated Reply: 4,500 words

1       10. These proposed word limits provide Defendants and Proposed  
2 Intervenors with 7,000 words for their motions and their combined reply and  
3 oppositions, consistent with Local Rule 11-6. Since Plaintiff intends to file a single  
4 consolidated opposition and cross-motion and a single consolidated reply instead of  
5 three separate oppositions and three separate replies, the parties propose that  
6 Plaintiff receive 1.5 times the usual word limit under Local Rule 11-6, as listed  
7 above. This expanded word limit will allow for Plaintiff to address the arguments  
8 raised by all three motions in a single brief and thereby facilitate the efficient  
9 resolution of the motions and this matter.

10       A proposed order is attached to this Joint Stipulation.

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1 Dated: September 9, 2025

2

3 **RILEY SAFER HOLMES & CANCILA**  
4 **LLP**

5 /s/ Bruce A. Wagman  
6 Bruce A. Wagman

7 *Counsel for Proposed Defendant-*  
8 *Intervenors Humane World for Animals,*  
9 *Animal Legal Defense Fund, Animal*  
10 *Equality, The Humane League, Farm*  
11 *Sanctuary, Compassion in World*  
12 *Farming, Inc., and Animal Outlook*

13

14 **WILMER CUTLER PICKERING**  
15 **HALE AND DORR LLP**

16 /s/ Brian M. Boynton  
17 Brian M. Boynton  
18 Thomas G. Saunders (pro hac vice  
19 pending)

20 *Attorneys for Proposed Defendant-*  
21 *Intervenor Association of California Egg*  
22 *Farmers*

23 Respectfully submitted,

24

25 **ROB BONTA**  
26 Attorney General of California  
27 **ANYA M. BINSACCA**  
28 Supervising Deputy Attorney General  
KRISTEN C.A. KIDO  
Deputy Attorney General

/s/ Kristin Liska

KRISTIN A. LISKA  
Deputy Attorney General  
Attorneys for Defendants

BRETT A. SHUMATE  
Assistant Attorney General  
YAAKOV M. ROTH  
Principal Deputy Assistant Attorney  
General  
ERIC HAMILTON  
Deputy Assistant Attorney General  
ALEXANDER K. HAAS  
Director, Federal Programs Branch  
JACQUELINE COLEMAN SNEAD  
Assistant Director, Federal Programs  
Branch

/s/ John Bailey  
JOHN BAILEY  
Counsel to the Assistant Attorney  
General  
U.S. Department of Justice

BILAL A. ESSAYLI  
United States Attorney  
DAVID M. HARRIS  
Assistant United States Attorney  
Chief, Civil Division  
DANIEL A. BECK  
Assistant United States Attorney  
Chief, Complex and Defensive  
Litigation Section  
JOSEPH W. TURSI  
Assistant United States Attorney  
Attorneys for Plaintiff

1 **ATTESTATION OF SIGNATURES (L. R. 5-4.3.4(a)(2))**

2 I, Kristin A. Liska, the attorney whose ECF credentials are being used in  
3 connection with this filing, hereby attest pursuant to Local Rule 5-4.3.4(a)(2), that  
4 all signatories listed, and on whose behalf this filing is submitted, concur in the  
5 filing's content and have authorized this filing.

6

7 Dated: September 11, 2025

*/s/ Kristin A. Liska* \_\_\_\_\_

8 KRISTIN A. LISKA  
9 Deputy Attorney General

10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

## CERTIFICATE OF SERVICE

Case Name: ***United States of America v. The State of California, et al.***  
Case No.: **2:25-cv-06230-MCS-AGR**

I, Vanessa Jordan, hereby certify that on September 11, 2025, I electronically filed the following documents with the Clerk of the Court by using the CM/ECF system:

- **JOINT STIPULATION SETTING [PROPOSED] BRIEFING SCHEDULE**
- **[PROPOSED] ORDER SETTING BRIEFING SCHEDULE**

I certify that all participants in the case who are registered CM/ECF users will be served electronically by the CM/ECF system.

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct.

This declaration was executed on September 11, 2025, at San Francisco, California.

---

Vanessa Jordan  
Declarant

---

*Vanessa Jordan*  
Signature